

EXHIBIT 1

**Re: Stipulation to Continue MTD Hearing / Garcia v. Roblox****From:** Robert Salgado <rsalgado@counterpointfirm.com>**Date:** Tue 10/7/2025 10:01 AM**To:** White, Benjamin <Benjamin.White@procopio.com>**Cc:** Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>

1 attachment (101 KB)

2025-09-09 - Dkt. 29 - ORDER Setting Hearing on MTD to 11-14-2025.pdf;

It was in the Joint Rule 26(f) Report. You guys requested the continuance during our meet and confer. It was also in the Judge's minute order (see attached).

Robert

From: White, Benjamin <Benjamin.White@procopio.com>**Sent:** Tuesday, October 7, 2025 8:45 AM**To:** Robert Salgado <rsalgado@counterpointfirm.com>**Cc:** Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>**Subject:** RE: Stipulation to Continue MTD Hearing / Garcia v. Roblox

Robert,

Could you point us to where the Court signed off on simultaneous hearings? I'm not seeing any mention in the scheduling order or the order continuing the MTD hearing to 11/14.

BENJAMIN WHITE

ASSOCIATE

PROCOPIO

P. 858.480.8232 | F. 619.788.5500 | benjamin.white@procopio.com

12544 HIGH BLUFF DRIVE, SUITE 400, SAN DIEGO, CA 92130

procopio.com**From:** Robert Salgado <rsalgado@counterpointfirm.com>**Sent:** Monday, October 6, 2025 7:04 PM**To:** White, Benjamin <Benjamin.White@procopio.com>**Subject:** Re: Stipulation to Continue MTD Hearing / Garcia v. Roblox

* EXTERNAL EMAIL - Please use Caution. *

Hi Benjamin,

Why do you guys want to postpone the hearing on the MTD? Everything is already briefed. If I remember correctly, the judge already signed off on doing the hearings at the same time.

Thanks,

Robert

From: White, Benjamin <Benjamin.White@procopio.com>**Sent:** Monday, October 6, 2025 3:16 PM**To:** Nalley Nungaray <nunngaray@counterpointfirm.com>; Robert Salgado <rsalgado@counterpointfirm.com>; Morgan D. Ross <Morgan@counterpointfirm.com>; Yazmine Jimenez <yjimenez@counterpointfirm.com>**Cc:** Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>**Subject:** RE: Stipulation to Continue MTD Hearing / Garcia v. Roblox

Counsel,

I'm following up on whether Plaintiffs would stipulate to continuing the MTD hearing.

Thanks,

BENJAMIN WHITE

ASSOCIATE

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procopio.com**From:** White, Benjamin**Sent:** Friday, October 3, 2025 4:00 PM**To:** Nalley Nungaray <nunngaray@counterpointfirm.com>; Robert Salgado <rsalgado@counterpointfirm.com>; Morgan D. Ross <Morgan@counterpointfirm.com>; Yazmine Jimenez <yjimenez@counterpointfirm.com>**Cc:** Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>**Subject:** Stipulation to Continue MTD Hearing / Garcia v. Roblox

Counsel,

We intend to file a motion to compel arbitration today in the federal Garcia case. We would like to notice the MTCA hearing for November 14, 2025. Would Plaintiffs be agreeable to continuing the current November 14 hearing on our motion to dismiss once we file the MTCA?

Thanks,

BENJAMIN WHITE

ASSOCIATE

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Mon Oct 06 2025 15:16:29

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Tue Oct 07 2025 08:45:08

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